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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

Imperial Pacific International (CNMI) LLC,
Best Sunshine International (BVI) Ltd.;

Plaintiffs,

VS.

Commonwealth of the Northern Mariana Islands, Commonwealth Casino Commission, Edward C. Deleon Guerrero, Chairman of CCC, in his official and personal capacities; Rafael S. Demapan, Vice Chairman of CCC, in his official and personal capacities; Mariano Taitano, Commissioner of CCC, in his official and personal capacities; and Does 1-5, all inclusive;

Defendants.

Case No. 1:24-cv-00002

**DECLARATION OF MICHAEL
CHEN**

I, Michael Chen, declare as follows:

1. I am above the age of 18 and am competent to testify as to the matters stated herein.

1 2. I am attorney of record (pro hac vice) for plaintiff in the above captioned matter.
2 3. As shown by proofs of service attached to this Declaration as **Exhibit 1**, Defendants
3 Edward C. Deleon Guerrero, Chairman of CCC, in his official and personal
4 capacities; Rafael S. Demapan, Vice Chairman of CCC, in his official and personal
5 capacities; Mariano Taitano, Commissioner of CCC, in his official and personal
6 capacities were served with the First Amended Complaint in this matter on May 9,
7 2024.
8 4. The First Amended Complaint were served upon the attorney of record for the three
9 defendants. Mr. Carl Allen Flores Dela Cruz, through the ECF System, See **Exhibit**
10 **1.**
11 5. More than 21 days have passed since these three defendants were served with the
12 First Amended Complaint, and neither of them have served a responsive pleading or
13 filed a motion within the time provided by Rule 12(a) of the Federal Rules of Civil
14 Procedure.

15 I declare under the penalty of perjury that the foregoing is true and correct. Executed
16 on June 6, 2024, in Fruitland, Utah.

18 Michael Chen
19 By: /s/ Michael Chen
20 Michael Chen Law Offices
21 7330 Edna Ave.
22 Las Vegas, NV 89117
23 *Pro Hac Vice*

24 Attorneys for Plaintiffs
25 IMPERIAL PACIFIC INTERNATIONAL
26 (CNMI), LLC, Best Sunshine International
27 (BVI) Ltd.

EXHIBIT

1

Thursday, June 6, 2024 at 17:33:03 Mountain Daylight Time

Subject: Activity in Case 1:24-cv-00002 Imperial Pacific International (CNMI) LLC v. Commonwealth of the Northern Mariana Islands et al

Date: Wednesday, May 8, 2024 at 12:00:37 PM Mountain Daylight Time

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U.S. District Court

Northern Mariana Islands

Notice of Electronic Filing

The following transaction was entered by Chen, Michael on 5/9/2024 at 3:59 AM GMT+10 and filed on 5/9/2024

Case Name: Imperial Pacific International (CNMI) LLC v. Commonwealth of the Northern Mariana Islands et al

Case Number: [1:24-cv-00002](#)

Filer: Imperial Pacific International (CNMI) LLC

Document Number: [26](#)

Docket Text:

First AMENDED COMPLAINT against Commonwealth of the Northern Mariana Islands, Edward C Deleon Guerrero, Rafael S Demapan, Mariano Taitano, Commonwealth Casino Commission with Jury Demand, filed by Imperial Pacific International (CNMI) LLC. (Attachments: # (1) Exhibit, # (2) Exhibit, # (3) Exhibit) (Chen, Michael)

1:24-cv-00002 Notice has been electronically mailed to:

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1:24-cv-00002 Notice will be delivered by other means to:

The following document(s) are associated with this transaction:

Document description: Main Document

Original filename: n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1107461626 [Date=5/9/2024] [FileNumber=288292-0]
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